



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

April 7, 1999

CERTIFIED MAIL NO. Z 245 569 170  
RETURN RECEIPT REQUESTED

In Reply Refer to: WST-3-1  
Facility: Chemical Waste  
Management  
EPA ID: CAT000646117

Mr. Bob Henry  
General Manager  
Chemical Waste Management  
35251 Old Skyline Road  
Kettleman City, CA 93239

Dear Mr. Henry:

Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927(a), the United States Environmental Protection Agency (U.S. EPA) may require persons subject to RCRA to furnish information necessary for U.S. EPA to administer the Act. Pursuant to U.S. EPA's authority set forth in Section 3007(a), you are requested to submit the following information.

1. Describe and submit copies of any and all Hazardous Waste Manifests and Land Disposal Restriction ("LDR") Notifications in your possession for any and all RCRA and non-RCRA hazardous waste shipped to Chemical Waste Management by **Rohr/BF Goodrich**, EPA Identification Number CAD008382053, located at 850 Lagoon Drive, Chula Vista, CA.
2. Describe and submit copies of any and all documents relating to the hazardous waste classification, including hazardous waste analyses reports and/or waste profiles, of any and all RCRA and non-RCRA hazardous waste shipped to Chemical Waste Management by **Rohr/BF Goodrich**, EPA Identification Number CAD008382053, located at 850 Lagoon Drive, Chula Vista, CA.

Section 3008 of RCRA, 42 U.S.C. 6928, authorizes the initiation of a civil enforcement proceeding for failure to respond fully to the information request set out in this letter. Section 3008 also authorizes criminal prosecution for knowingly making a false statement or omitting material information.

U.S. EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part 2, Subpart B. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. 2.203(b). If U.S. EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. U.S. EPA will construe the failure to furnish a confidentiality claim with your response with this letter as a waiver of that claim, and information may be made available to the public by U.S. EPA without further notice.

This request for information is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§ 3502(4) and (11), 3507, 3512, and 3518. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. § 3502(4), (11); 5 C.F.R. § 1320.5(a).

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to U.S. EPA within seven (7) days of receipt of this letter. Please address the submittal to:

Robert Rodriguez (WST-3-1)  
RCRA Enforcement Section  
U.S. Environmental Protection Agency,  
75 Hawthorne Street  
San Francisco, CA 94105

If you have any questions regarding this matter, please contact Robert Rodriguez at (415) 744-2145. Your cooperation in this matter is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Rodriguez", is written over the typed name and title.

Robert Rodriguez, Acting Chief  
RCRA Enforcement Section

cc: Rich Vaille, State Programs and Compliance Branch  
Cheryl Nelson, Senior Regulatory Advisor